

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JANNIE PILGRIM, GIOVANNA HENSON, :  
JESAN SPENCER, BRENDA CURTIS, :  
:  
Plaintiffs, : Civil Action No.: 07-6618 (CM) (AJP)  
:  
against :  
:  
THE MCGRAW-HILL COMPANIES, INC., :  
:  
Defendant. :  
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**DECLARATION OF ELISE M. BLOOM, ESQ. INDEXING DOCUMENTS  
SUPPORTING DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Elise M. Bloom declares, pursuant to 28 U.S.C. § 1746, and under penalty of perjury, that the following is true and correct:

1. I am a member of the firm of Proskauer Rose LLP, counsel for The McGraw-Hill Companies, Inc. (“Defendant” or “McGraw-Hill”), defendant in the above-captioned matter, and I submit this Declaration in further support of Defendant’s Motion for Summary Judgment.
2. Attached as Exhibit A is a copy of the application for the Talent Acquisition Specialist position at McGraw-Hill submitted by Judy Kilduff on May 2, 2003, bearing Bates numbers D07235-38, which was produced by McGraw-Hill during the course of this litigation.
3. Attached as Exhibit B is a copy of Plaintiff Henson’s exit interview with Sheila O’Neill’s handwritten notes, bearing Bates numbers D00217-20, which was produced by McGraw-Hill during the course of this litigation.
4. Attached as Exhibit C is a true and correct copy of relevant portions of the transcript from Plaintiff Brenda Curtis’s deposition, taken on January 11, 2008.

5. Attached as Exhibit D is a true and correct copy of relevant portions of the transcript from Plaintiff Jesan Spencer's deposition, taken on January 3, 2008.

6. Attached as Exhibit E is a true and correct copy of relevant portions of the transcript from Plaintiff Giovanna Henson's deposition, taken on January 9, 2008.

7. Attached as Exhibit F is a true and correct copy of relevant portions of the transcript from Ken Caruso's deposition, taken on April 15, 2008.

8. Attached as Exhibit G is a true and correct copy of relevant portions of the transcript from Sheila O'Neill's deposition, taken on February 29, 2008.

9. Attached as Exhibit H is a true and correct copy of relevant portions of the transcript from William Harper's deposition, taken on April 9, 2008.

10. Attached as Exhibit I is a true and correct copy of relevant portions of the transcript from Brett Marschke's deposition, taken on April 18, 2008.

11. Attached as Exhibit J is a true and correct copy of relevant portions of the transcript from Plaintiff Jannie Pilgrim's deposition, taken on February 22, 2008.

12. Attached as Exhibit K is a true and correct copy of relevant portions of the transcript from Richard Fisher's deposition, taken on March 5, 2008.

Dated: July 24, 2008

  
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ELISE M. BLOOM